

Jerod Kronholm
Searsport, Maine

Testimony in Support of LD 2054

An Act to Clarify the Laws Regarding Moose Hunting Permits for Hunting Outfitters

Senator Baldacci, Representative Roberts, and members of the Committee:

My name is **Jerod Kronholm**, and I am a co-owner of **Big Mountain Outfitters**. I am in support of **LD 2054**.

Since the inception of the *lodge tag program*, there has been a drastic decline in the number of **non-resident moose permits available through the general lottery**. In some Wildlife Management Districts (WMDs), there have been **zero bull permits** available to non-residents through the lottery. This has resulted in a significant loss of business opportunities for many Registered Maine Guides and has created false expectations for approximately **25,000 non-residents** who apply each year, believing they have a meaningful chance at drawing a permit.

Below are the **2025 September bull permit numbers**, provided by the Department of Inland Fisheries and Wildlife (IFW). I have not included October data because most lodge tags are awarded in September due to the lottery algorithm currently used by IFW. Please note that **five WMDs issued zero non-resident lottery permits while still awarding lodge tags**.

2025 September Bull Permits

WMD	Non-Resident Lottery	Lodge Tags
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1	7	15
2	15	2
3	1	9
4	7	13
5	0	12
6	1	9
10	0	3
11	0	2

18	1	1
19	0	3
27/28	0	2
Total	32	71

As shown above, lodge tags more than doubled the number of non-resident lottery permits, with some WMDs completely excluding lottery applicants.

Proposed Changes I Support Under LD 2054

I respectfully urge the committee to consider the following clarifications and reforms:

1. **Cap lodge permits at no more than 50% of the non-resident lottery permits**, evenly split between the September and October bull seasons.
 - Any unused lodge permits should be returned to the general non-resident lottery.
2. **Adjacency requirements** to keep lodge permits close to the lodge's geographic location.
3. **No swapping of lodge permits with lottery permits.**
 - A lodge permit should remain in, or immediately adjacent to, the WMD in which it was drawn.
4. **No sale of sub-permittee slots.**
5. **No selling or transferring of lodge permits from one qualified lodge to another.**

Questions and Answers

Why should a permit cap exist?

Answer:

In 2025, **82 lodge tags** were awarded, with approximately **two-thirds issued during the September season alone**. By capping lodge permits at 50% per week, season, and WMD, permits would be more evenly distributed between lodges and non-resident lottery applicants. There should never be a situation where **every single permit in a WMD is issued to lodges and zero are issued through the lottery**.

Why is adjacency important?

Answer:

Currently, there is significant manipulation occurring within the lodge tag system. Many permits are not guided by the original lodge recipient. Instead, deals are brokered between lodges and other guides through informal subcontracting arrangements. This allows a lodge located in southern Maine to obtain a permit in northern Maine, near the eventual client's intended hunting location.

An adjacency requirement would ensure that lodge permits are used by legitimate operations guiding near their home base, preserving the intent of the program.

Why prohibit swapping lodge permits with lottery permits?

Answer:

This is another loophole that enables manipulation. For example, if Lodge A draws a permit in WMD 1 and wants to sell it to Lodge B operating in WMD 11, a simple permit swap can occur once general lottery results are released. This undermines fairness, transparency, and integrity of the permit system.

Why prohibit selling sub-permittee slots?

Answer:

Selling sub-permittee slots is already prohibited under the general lottery system. However, this restriction is not clearly defined within the lodge tag program. LD 2054 would clarify and align these rules to prevent abuse.

Why prohibit selling lodge permits from one lodge to another?

Answer:

While lodge tags provide financial benefits to both lodges and local economies, the resale of permits between lodges has encouraged excessive greed within the industry. Lodges represent a **minority** of the guiding community. There are far more Registered Maine Guides who do not own lodges and who rely on booking hunts through the general lottery system.

Additionally, non-resident hunters who have applied faithfully for years—hoping for a once-in-a-lifetime bull permit—have seen their chances drastically reduced. This system should balance economic opportunity with fairness and public trust.

Closing

LD 2054 is not about eliminating lodge tags. It is about **clarifying the rules, closing loopholes, and restoring fairness** to Maine's moose permit system while preserving opportunity for guides, lodges, and non-resident hunters alike.

Thank you for your time and consideration.

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LD 2054

Hi please accept this submission for written testimony regarding the moose lodge tags. Thank you.